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12 TAYLOR THOMSON

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 Taylor Thomson

16 Plaintiff,

17 v.

18 Persistence Technologies BVI Pte Ltd.,
Tushar Aggarwal, Ashley Richardson,

19 Defendants.

20 Case No. 2:23-cv-04669-MEMF-MAR

21 **PLAINTIFF TAYLOR THOMSON'S**
NOTICE OF MOTION AND
MOTION TO COMPEL
DEFENDANT ASHLEY
RICHARDSON'S RESPONSES TO
PLAINTIFF'S RFPS AND ROGS;
MEMORANDUM OF POINTS AND
AUTHORITIES

22 The Honorable Margo A. Rocconi,
United States Magistrate Judge

23 Date: November 12, 2025

24 Time: 11:00 a.m.

Courtroom: 790

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** that on November 12, 2025, at 11:00 a.m.,
3 or as soon thereafter as the Court is available, before the Honorable Margo A. Rocconi,
4 in Courtroom 790 of the United States District Court, Central District of California,
5 located at 255 E. Temple Street, 7th Floor, Los Angeles, California 90012, Plaintiff
6 Taylor Thomson (“Plaintiff”) will and hereby does move the Court to compel
7 Defendant Ashley Richardson (“Defendant”) to (1) fully respond to Plaintiff’s ROG
8 Nos. 1 and 8, (2) provide a signed verification for all of her ROG responses, and
9 (3) produce all responsive documents in her possession, pursuant to Federal Rules of
10 Civil Procedure 26 and 37, on the grounds that Plaintiff’s discovery requests are
11 relevant, Defendant’s objections are untimely and improper, and that Defendant’s
12 current responses and production are deficient.

13 Pursuant to Local Rule 37-2.4(b), Defendant has failed to provide her portion of
14 a Joint Stipulation under Local Rule 37-2.2. The parties met and conferred on this issue
15 on October 7, 2025. During that meet-and-confer, Defendant said that she would
16 supplement her responses to certain ROGs but refused to supplement others and also
17 committed to produce additional documents responsive to Plaintiffs requests.
18 Defendant did not produce any further documents, in spite of repeated requests from
19 Plaintiff. Following that meet and confer, Plaintiff provided her position to Defendant
20 in Joint Stipulation form reflecting the outstanding discovery disputes. Defendant
21 refused to respond with her position, in spite of multiple requests by Plaintiff.
22 Accordingly, Plaintiff now seeks relief from the Court.

23 This Motion is based on this Notice of Motion and Motion, the accompanying
24 Memorandum of Points and Authorities, the Declaration of Julian L. André (“André
25 Decl.”) and supporting exhibits, the pleadings, records, and files in this action, any
26 reply memoranda or additional briefing on this subject, the attached proposed order,
27
28

1 and on such further oral and written matters as the Plaintiff may present at or before
2 the hearing on this matter.

3 For the reasons stated above and set forth in the accompanying Memorandum
4 of Points and Authorities, Plaintiff respectfully requests that the Court grant Plaintiff's
5 Motion to Compel.

6 Dated: October 21, 2025

7 **MCDERMOTT WILL & SCHULTE LLP**

8 By: /s/ Julian L. André
9 JULIAN L. ANDRE
10 TODD HARRISON
JOSEPH B. EVANS

11 Attorneys for Plaintiff
12 TAYLOR THOMSON

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

This case arises from Plaintiff’s allegations that Defendant, acting in concert with others, fraudulently induced her to invest over \$46 million in a cryptocurrency called XPRT issued by Persistence Technologies. The fifty-nine page First Amended Complaint asserts that Defendant—while secretly receiving a kickback—misled Plaintiff, misrepresented her position, overstated potential returns, and funneled Plaintiff’s investments into multiple wallets to manipulate market perception. Plaintiff brings claims under federal and California securities laws, common-law fraud, and related statutes. In response, Defendant asserts vague and completely fact-free counterclaims for defamation and intentional infliction of emotional distress (“IIED”).

Defendant’s counterclaims fail to allege any of the key facts necessary to support her claims—such as the specific defamatory statements at issue, when they were made, and to whom they were communicated. Without these foundational details, Plaintiff cannot meaningfully evaluate or defend against Defendant’s allegations. Accordingly, on September 12, 2024, Plaintiff served targeted discovery—comprised of RFPs and ROGs—seeking information related to her own claims as well as the factual basis and evidentiary support for Defendant’s counterclaims.

Defendant failed to respond to Plaintiff's discovery requests by the deadline, and thereby waived her right to object to the discovery demands. Defendant eventually served untimely and incomplete objections, but no documents or response, to Plaintiff's RFPs on April 30, 2025. Defendant's responses to Plaintiff's RFPs were riddled with boilerplate and inapplicable objections, and the accompanying production consisted of documents which were largely irrelevant and were not responsive to the numerous categories of documents sought by Plaintiff. It was not until August 11, 2025, that Defendant served incomplete and unverified responses to Plaintiff's ROGs.

1 In light of Plaintiff's pending *Ex Parte* Application to Continue the Discovery
2 Deadlines, Plaintiff brings this Motion to Compel to preserve her discovery rights in
3 the event the Court grants that Application and extends the discovery period. Plaintiff
4 seeks to compel Defendant to (1) fully respond to Plaintiff's ROG Nos. 1 and 8, (2)
5 provide a signed verification for all of her ROG responses, and (3) produce all
6 responsive documents in her possession.

7 **II. BACKGROUND**

8 On September 12, 2024, Plaintiff served Defendant with Requests for
9 Production of Documents ("RFPs") and Interrogatories ("ROGs"). *See* André Decl.,
10 Exs. A (RFPs) & B (ROGs). After failing to receive any response from Defendant,
11 Plaintiff's counsel sent a letter to Defendant on March 21, 2025, concerning her
12 outstanding responses to discovery and reattaching the previously served discovery
13 demands. André Decl., Ex. C. That letter specifically noted that due to Defendant's
14 failure to timely respond to discovery, she had "waived any and all objections that
15 [she] may have had" and requested that she "respond in full to the Discovery by April
16 30." *Id.*

17 On April 30, Defendant responded with a cursory, two-page response and
18 objections to Plaintiff's RFPs and requested a 30-day extension to respond but
19 produced no documents nor did she respond or object to Plaintiff's ROGs. *See* André
20 Decl., Ex. D.

21 On June 6, 2025, Defendant finally produced documents in response to
22 Plaintiff's initial RFPs. However, Defendant's production was plainly deficient. Out
23 of the 604 documents she produced, 443 are screenshots of a single Telegram
24 conversation with Defendant Aggarwal, 10 are screenshots of a Telegram conversation
25 with another Persistence employee, and 4 are emails with Defendant Aggarwal. The
26 overwhelming majority of the remaining documents are emails that are not relevant to
27 this case.

1 Critically, Defendant produced no documents in response to the specific
2 discovery demands relating to her counterclaims or to her alleged damages, such as
3 any evidence of the alleged defamatory statements, her employment, income, or
4 medical records; no wallet or transaction data that would show her involvement in the
5 Persistence project or crypto flows; and no communications with any other party
6 relevant to her counterclaims. She did not produce any of the documents she referred
7 to in her pleadings or discovery objections. And Defendant has not produced a
8 privilege log, despite asserting attorney-client and work-product objections. These
9 glaring omissions persist despite Plaintiff's repeated efforts to resolve the issues
10 without court intervention, including a detailed meet-and-confer letter sent on July 11,
11 2025, outlining these deficiencies. André Decl., Ex. E. Defendant has subsequently
12 supplemented her production with additional documents on or around August 11, 2025.
13 However, this production also failed to include any documents concerning her alleged
14 damages, cryptocurrency transaction records, or any other information related to any
15 of the claims in this case.

16 On August 11, 2025, Defendant finally served her responses to Plaintiff's ROGs.
17 Despite the nearly year-long delay, the responses were deficient and non-responsive—
18 offering irrelevant and inadmissible assertions to some ROGs and outright refusing to
19 answer others, while still failing to state or document a single specific fact, for instance,
20 relating to her Counterclaim regarding defamation. On August 29, 2025, Plaintiff sent
21 Defendant a detailed letter cataloging the deficiencies in her ROG responses and
22 demanding supplementation. André Decl., Ex. F. To date, Defendant has refused to
23 correct any of the deficiencies.

24 Given the deficiencies, on October 1, 2025, Plaintiff's counsel contacted
25 Defendant concerning a meet and confer pursuant to Local Rule 37. The parties met
26 and conferred on October 7, 2025. During that meet and confer, Plaintiff raised the
27 various deficiencies in Defendant's responses and production to Plaintiff's discovery
28

1 requests. In response, Defendant agreed that she would supplement her responses to
2 ROG Nos. 12 and 15, but would not supplement her responses to ROG Nos. 1, 8, 10,
3 11, or 13 because she believed that she had responded substantially and sufficiently
4 and the further information she *could* provide in response she was withholding and
5 refusing to produce to Plaintiff until she could produce that information under seal.
6 Further, Defendant agreed that she would produce a number of documents by October
7 10 which were responsive to Plaintiff's requests requesting medical records
8 documenting her IIED damages and other categories.

9 Following that meet-and-confer, Defendant supplemented her responses to
10 ROG Nos. 12 and 15 but did not produce any further documents despite her prior
11 assurances. Further, Defendant failed to respond to Plaintiff's multiple attempts to
12 stipulate to a protective order in order to facilitate discovery in this case, forcing
13 Defendant to unilaterally move on October 17, 2025 for a protective order based on
14 this Court's Sample Stipulated Protective Order. (*See* Dkt. 127.)

15 **III. LEGAL STANDARD**

16 Pursuant to Federal Rules of Civil Procedure Rule 26, “[p]arties may obtain
17 discovery regarding any nonprivileged matter that is relevant to any party’s claim or
18 defense and proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1). Information
19 subject to discovery “need not be admissible in evidence to be discoverable.” *Id.*

20 District courts have “broad discretion” to control discovery and in determining
21 relevancy for discovery purposes. *See Hallett v. Morgan*, 296 F.3d 732, 751 (9th Cir.
22 2002) (citation and alteration omitted). Motions to compel are governed by Rule 37,
23 which allows a party to “move for an order compelling disclosure or discovery.” Fed.
24 R. Civ. P. 37(a)(1). “A party seeking discovery may move for an order compelling an
25 answer [or] . . . production” if a party fails to answer an interrogatory or produce
26 requested documents. Fed. R. Civ. P. 37(a)(3)(B)(iii)-(iv). “Upon a motion to compel

1 discovery, the movant has the initial burden of demonstrating relevance.” *United States*
2 v. *McGraw-Hill Companies, Inc.*, 2014 WL 1647385, at *8 (C.D. Cal. Apr. 15, 2014).

3 **IV. ARGUMENT**

4 **A. Plaintiff’s Discovery is Relevant**

5 Plaintiff’s written discovery follows the logical arc of the operative pleadings.
6 *First*, RFP Nos. 1, 3-32, 71-73, 76 and ROGs 2, 10-11, 13-14 are directly related to
7 Plaintiff’s claims for fraud and securities-law violations. For example, these requests
8 seek Defendant’s communications with Persistence, marketing material, wallet
9 records, information about any kick-backs or other benefits she received from her
10 promotion of XPRT, and other information relevant to the fraud and securities-law
11 counts raised in the First Amended Complaint. Specifically, **RFP No. 5** asks for “All
12 Documents, Communications, and Records Concerning or in any way related to Taylor
13 Thomson, including, but not limited to, Ms. Thomson’s investment in any products
14 offered by Persistence or offered by other entities in connection with Persistence, or
15 any cryptocurrency.”; **RFP No. 29** asks for “Documents sufficient to identify all digital
16 wallets associated with You in any way.”; and **RFP No. 71** asks for “All Documents,
17 Communications, and Records Concerning all of Your Digital Wallets.” *See* André
18 Decl., Ex. A.

19 *Second*, RFP Nos. 2, 33-70 and ROG Nos. 1, 3-11, 13-15 are directly related to
20 the issues raised in Defendant’s counterclaims and initial disclosures. These requests
21 seek documents supporting the allegations Defendant herself made in her
22 counterclaims, the identities of the people to whom Plaintiff’s supposed defamatory
23 statements were published, the exact words used, and evidence supporting Defendant’s
24 claimed reputational, economic, and emotional-distress damages. For example:

- 25 • **RFP No. 39** asks for “All Documents, Communications, and Records
26 sufficient to identify the ‘individuals within Richardson’s and Thomson’s

1 shared social circle’ that You allege Ms. Thomson told that You
2 ‘committed Fraud and Theft of cryptocurrency.’”

- 3 • **RFP No. 40** asks for “All Documents, Communications, and Records
4 Concerning Your allegation that Ms. Thomson told ‘individuals within
5 Richardson’s and Thomson’s shared social circle’ that You ‘committed
6 Fraud and Theft of cryptocurrency.’”
- 7 • **RFP No. 41** asks for “All Documents, Communications, and Records
8 sufficient to identify the ‘individuals within Cryptocurrency and Financial
9 sectors’ that You allege Ms. Thomson told that You ‘had committed Fraud
10 and Theft of cryptocurrency.’”
- 11 • **RFP No. 42** asks for “All Documents, Communications, and Records
12 sufficient to identify the ‘individuals within Cryptocurrency and Financial
13 sectors’ that You allege Ms. Thomson told that You ‘had committed Fraud
14 and Theft of cryptocurrency.’”
- 15 • **RFP No. 43** asks for “All Documents, Communications, and Records
16 Concerning the ‘false Defamatory Lies’ that You allege Ms. Thomson
17 ‘spread with malice and with knowledge that they were false, or with a
18 reckless disregard for the truth.’”
- 19 • **RFP No. 44** asks for “All Documents, Communications, and Records
20 sufficient to identify Your employment from January 2019 to present.
- 21 • **RFP No. 45** asks for “All Documents, Communications, and Records
22 sufficient to identify all sources of Your income from January 2019 to
23 present.”
- 24 • **RFP No. 46** asks for “All Documents, Communications, and Records
25 sufficient to identify any injury to any of the following: Your ‘professional
26 reputation, character, trade [or] business.’”

- 1 • **RFP No. 60** asks for “All Documents, Communications, and Records
2 Concerning Your allegation that You ‘suffer and continue[] to suffer
3 severe emotional and physical distress, continuous panic attacks,
4 insomnia, and crippling depression as a direct result of Thomson’s
5 outrageous conduct.””
- 6 • **RFP No. 65** asks for “All Documents, Communications, and Records
7 Concerning Your allegation that You ‘suffered a severe mental and
8 physical breakdown.””
- 9 • **RFP No. 66** asks for “All Documents, Communications, and Records
10 reflecting all injuries, illnesses, diseases, and/or medical conditions
11 incurred by you and for which You seek recovery in relation to this
12 lawsuit, including but not limited to medical Records.””
- 13 • **RFP No. 67** asks for “All of Your medical Records from 2010 to the
14 present.””

15 André Decl., Ex. A.

16 These requests are particularly important given that Defendant has repeatedly
17 refused to state any facts concerning her counterclaims and her failure to identify even
18 the basic elements necessary to support her claims for defamation and intentional
19 infliction of emotional distress or the damages that she seeks, while simultaneously
20 asserting that she in fact has such highly relevant documents and information, but
21 refuses to produce them. For example, Defendant has not alleged any statement by
22 Plaintiff, when those statements were made, or the identities of any of the individuals
23 who these statements were purportedly published to. And yet, Defendant has
24 repeatedly asserted that she has such documents and information. *See, e.g.*, André
25 Decl. ¶ 9. Without such information, Plaintiff cannot adequately defend herself against
26 Defendant’s counterclaims. Nor has Defendant produced any documents or evidence
27 related to her alleged damages.

1 Finally, RFPs 74-75, 77-81 and ROG 12 ask for the very documents and facts
2 that Defendant herself has relied on in her Answer, Counterclaim and discovery
3 responses. In short, every request is tethered to a pled claim or defense and is therefore
4 relevant under Rule 26(b)(1). Defendant alleges that she has possession of responsive
5 documents and information, but refuses to produce it.

6 **B. Defendant's RFP Objections Do Not Justify Withholding**
7 **Responsive Documents**

8 Defendant asserts a “General Objection” that the original service of the
9 discovery requests via email was “improper and ineffective . . . as [Defendant] never
10 consented in writing to electronic service.” This is patently untrue. On January 17,
11 2024, Ms. Richardson expressly agreed to service by email. André Decl., Ex. G. And
12 on September 26, 2024, the Court granted Defendant’s Application for Pro Se
13 Electronic Filing and expressly ordered her to register for the Court’s CM/ECF system.
14 (Dkt. 81.) Despite this directive, Defendant never complied. And in any event, Plaintiff
15 re-delivered her discovery requests via mail on March 24, 2025. Defendant did not
16 respond to that communication until April 30, 2025—and even then, only with
17 objections to Plaintiff’s RFPs. Defendant’s untimely responses waive any objection
18 she may have. *Richmark Corp. v. Timber Falling Consultants*, 959 F.2d 1468, 1473
19 (9th Cir. 1992) (“[F]ailure to object to discovery requests within the time required
20 constitutes a waiver of any objection.”); *Gee v. Gallardo*, 2020 WL 2083018, at *2
21 (C.D. Cal. Mar. 5, 2020) (“Generally, when a party fails to timely and properly object
22 to a discovery request, such objections are waived.”) (citation omitted).

23 Defendant also asserts specific objections to three RFPs, each of which are
24 similarly inapposite. Defendant objects to RFP No. 74, which seeks “All
25 Communications between You and any person at Cadwalader, Wickersham & Taft LLP
26 after November 7, 2023[,]” stating “The requests seek information protected by the
27 attorney-client privilege, work product doctrine, or other applicable privileges.”

1 Defendant's assertion of privilege makes no sense given the fact that Defendant is
2 proceeding *pro se* and has claimed *repeatedly* and vociferously that she is
3 unrepresented in this matter and proceeding *pro se*, and has asked the court repeatedly
4 to grant her leeway on that basis. At the very least, Defendant should be compelled to
5 provide a privilege log pursuant to Federal Rule of Civil Procedure 26(b)(5)(A).

6 Defendant's boiler-plate objections to RFP 67 and RFP 71 fare no better. RFP
7 67 demands "All of Your medical Records from 2010 to the present." RFP 71 demands
8 "All Documents, Communications, and Records Concerning all of Your Digital
9 Wallets." To both of these RFPs, Defendant asserts the following objection:

10 **1. Overbroad, Burdensome, and Oppressive:**

11 The requests are overbroad, unduly burdensome, and oppressive,
12 seeking information disproportionate to the needs of the case.

13 **2. Privacy and Confidentiality:**

14 The requests seek disclosure of confidential, proprietary, financial,
15 or personal information without adequate protections or showing of
necessity.

16 **3. Relevance:**

17 The requests seek information that is irrelevant to the claims or
18 defenses at issue and not reasonably calculated to lead to the
discovery of admissible evidence.

19 RFP 67 is reasonably tailored to the time period from 2010 to present and is
20 directly relevant to Defendant's claim that she suffers from "severe emotional and
21 physical distress, continuous panic attacks, insomnia, and crippling depression" which
22 is the basis for her IIED claim. Those records are uniquely in her possession, and
23 because she has repeatedly put her medical condition in issue, they are discoverable.

24 *See Much v. Gessesse*, 339 F.R.D. 625, 630 (C.D. Cal. 2018) (citation omitted)
25 (Medical records are discoverable where a plaintiff has "alleged emotional distress that
26 is 'complex' or has resulted in specific disorders."); *id.* ("[A] plaintiff may waive the
right to privacy and the psychotherapist-patient privilege by initiating litigation that

1 turns on a determination of the plaintiff’s medical condition.”); *Bertram v. Sizelove*,
2 2012 WL 273083, at *2-3 (Plaintiff waived any privacy right in his medical records by
3 filing a lawsuit that puts his medical condition at issue); *see also Ferrell v. Glen-Gery*
4 *Brick*, 678 F. Supp. 111, 112-13 (E.D. Pa. 1987) (“when a party places his or her
5 physical or mental condition in issue, the privacy right is waived.”). RFP 71 targets
6 digital wallet addresses and transaction records needed to trace the XPRT payments
7 and validator-node rewards that underlie Plaintiff’s fraud and securities claims; those
8 materials reside almost entirely with Defendant and can be produced with minimal
9 effort (export or screenshot). The requests thus satisfy Rule 26(b)(1)’s proportionality
10 factors and are plainly relevant to this action.

11 Defendant’s time-waived, boilerplate objections do not justify her failure to
12 produce responsive documents to Plaintiff’s RFPs. To date, Defendant has failed to
13 produce—among other things—any documentation supporting any of her claims of
14 defamation or IIED. Defendant has produced no communications indicating any
15 defamatory statement made by Plaintiff, no medical records showing any of the
16 physical or mental damages she alleges she suffered, nor has Defendant produced any
17 financial or tax records which would substantiate her purported damages to her career.
18 Thus, Defendant should be compelled to produce all such documents in her possession.

19 **C. Defendant Fails to Adequately Respond to Plaintiff’s ROGs**

20 Defendant’s responses to Plaintiff’s ROGs are wholly irrelevant and non-
21 responsive to the information requested.

22 Plaintiff’s ROG No. 1 demands that Defendant “Identify and state the factual
23 basis and the specific evidence supporting the factual basis for each counterclaim that
24 You have asserted or intend to assert in this action.” Defendant’s 12-page response to
25 ROG No. 1 (which is too long to practically reproduce here verbatim) fails to identify
26 a single fact or piece of evidence that would support her counterclaims for defamation
27 or IIED.

28

1 With respect to her defamation claim, rather than identifying any specific
2 defamatory statement, when it was made, or to whom it was made, Defendant rehashes
3 the vague and conclusory allegations in her complaint stating:

4 The factual basis for these counterclaims arises from numerous credible
5 and consistent reports over an extended period from individuals across
6 multiple sectors of my life, including the film and television industry,
7 cryptocurrency and finance sectors, and our formerly close mutual social
8 circle. These individuals have independently relayed that Ms. Thomson
9 has made statements to the effect that I:

- 10 • Committed fraud and theft in connection with cryptocurrency,
11 • Conspired with others, including members of the Persistence
12 team, to defraud her,
13 • Misrepresented my professional background and never had a
14 legitimate career; and
15 • Engaged in conduct that directly caused her financial losses.

16 Defendant asserts that she possesses “Direct Accounts from Multiple Witnesses,”
17 “Corroborating Circumstantial Evidence,” and “Anticipated Discovery Evidence,” yet
18 she has failed to produce or identify any such evidence. Instead, she claims she is
19 “intentionally withholding the names of individuals who expressed concern and
20 relayed the disparaging remarks that Ms. Thomson was disseminating at this stage due
21 to the extraordinary wealth, influence, and reach of Ms. Thomson, combined with her
22 present hostility toward me.” Defendant’s alleged fear of retaliation is unsubstantiated,
23 false, and does not constitute a proper basis to withhold discovery.

24 Furthermore, Defendant refused to respond to ROGs No. 8, which demands
25 Defendant “State all facts Concerning each of the ‘primary legal issues to be addressed
26 in the Counterclaim of this matter’ listed on Pages 5-8 of the Joint Rule 26(f) Report
(ECF 77) including, but not limited to, the date and time of each specific event or
27 conversation, the individuals involved in each event or conversation, and the specific
28 contents of each event or conversation.”

As a threshold matter, Defendant did not serve her unverified responses to Plaintiff's ROGs until August 11, 2025. Her objections are therefore waived as untimely. *See Richmark Corp.*, 959 F.2d at 1473. Moreover, each ROG directly addresses issues that Defendant herself raised in her Rule 26 disclosures or seeks information from third parties who may possess relevant knowledge concerning her claims. The ROGs are plainly relevant, and Defendant has no valid basis for refusing to respond fully and with verified answers.

V. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court compel Defendant to fully respond to Plaintiff's ROG Nos. 1 and 8, provide a signed verification for all of her ROG responses, and produce all documents responsive to Plaintiffs' RFPs in her possession.

Dated: October 21, 2025

MCDERMOTT WILL & SCHULTE LLP

By: /s/ Julian L. André
JULIAN L. ANDRÉ
TODD HARRISON
JOSEPH B. EVANS

Attorneys for Plaintiff
TAYLOR THOMSON

1 **CERTIFICATE OF COMPLIANCE**
2
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5 The undersigned, counsel of record for Plaintiff Taylor Thomson certifies that
6 this brief contains 3,304 words, which complies with the word limit of L.R. 11-6.1.
7
8
9

10 Dated: October 21, 2025

11 _____
12 /s/ Julian L. André

13 Julian L. André

14 McDERMOTT WILL & SCHAFFNER LLP
15 ATTORNEYS AT LAW
16 LOS ANGELES

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PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in Los Angeles, California. My business address is McDermott Will & Schulte, LLP, 2049 Century Park East, Suite 3200, Los Angeles, CA 90067. I am over the age of eighteen years and not a party to this action.

On October 21, 2025, I served copies of the following documents:

**PLAINTIFF TAYLOR THOMSON'S NOTICE OF MOTION AND MOTION
TO COMPEL DEFENDANT ASHLEY RICHARDSON'S RESPONSES TO
PLAINTIFF'S RFPS AND ROGS; MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF JULIAN L. ANDRE IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL AND SUPPORTING EXHIBITS**

on the following party via U.S. Mail and Electronic Mail:

Ashley Richardson
25399 Markham Lane
Salinas, CA 93908
ashrichardson@mac.com

Defendant in Pro Per

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on October 21, 2025 in Los Angeles, California.

/s/ Joshua Yim
Joshua Yim